

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JOSEPH THOMAS KONUPKA, III	:	
	:	CASE NO. 1:19-bk-02953
aka Joseph Thomas Konupka	:	
Debtor	:	
	:	
CRESCENT MORTGAGE COMPANY	:	
Movant	:	
	:	
JOSEPH THOMAS KONUPKA, III	:	
	:	
aka Joseph Thomas Konupka	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The Debtor's plan provides for conduit mortgage payments. The Debtor was seriously ill and unable to work for two weeks which caused him to fall behind slightly (\$735) with the Trustee, but he will cure the plan arrearages within a short period of time.
7. Denied. See response to paragraph 6.
8. Denied. See response to paragraph 6.
9. Denied. Debtor is \$735.00 behind with the trustee but will cure the arrearages quickly.
10. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
11. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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